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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JORGE CALDERON-CAMPOS,  
  
Defendant.

CASE NO. 1:22-CR-00130-JLT-SKO  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
  
DATE: November 16, 2022  
TIME: 1:00 p.m.  
COURT: Hon. Magistrate Judge Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on November 16, 2022.
2. By this stipulation, the parties move to continue the status conference until February 1, 2023, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between November 16, 2022, and February 1, 2023.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Initial discovery was provided to defendants on or about May 20, 2022, consisting of 1,082 Bates-stamped items including wiretap data, reports of investigation, photographs, recordings of post-arrest interviews, and a summary of defendant's criminal history.

1           b)     Counsel for defendant desires additional time to review discovery, consult with  
2     his client, conduct investigation and research related to the charges, engage in plea negotiations,  
3     and otherwise prepare for trial.

4           c)     Counsel for defendant believes that failure to grant the above-requested  
5     continuance would deny him the reasonable time necessary for effective preparation, taking into  
6     account the exercise of due diligence.

7           d)     Based on the above-stated findings, the ends of justice served by continuing the  
8     case as requested outweigh the interest of the public and the defendant in a trial within the  
9     original date prescribed by the Speedy Trial Act.

10          e)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11     et seq., within which trial must commence, the time period of November 16, 2022 to February 1,  
12     2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it  
13     results from a continuance granted by the Court at the defendant's request on the basis of the  
14     Court's finding that the ends of justice served by taking such action outweigh the best interest of  
15     the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 1, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ KAREN A. ESCOBAR  
KAREN A. ESCOBAR  
Assistant United States Attorney

/s/ DAVID A. TORRES  
DAVID A. TORRES  
Counsel for defendant Jorge Calderon-Campos

**ORDER**

IT IS SO ORDERED.

DATED: 11/9/2022

Sheila K. Oberto  
THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE